



August 1, 2011

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, DC 20554

In re: LightSquared Subsidiary, LLC, 26 FCC Rcd 566 (Int'l. Bur. 2011)

Dear Ms. Dortch:

TomTom, Inc., a company headquartered in Massachusetts which distributes and sells portable and in-car location and navigation products and services which rely on GPS technology, remains deeply concerned about the application of LightSquared for a waiver from the FCC allowing terrestrial broadband transmissions in the mobile satellite service (MSS) spectrum.

As an advisor to the Working Group (WG), TomTom collaborated with LightSquared and other concerned parties to evaluate the effect LightSquared's proposed network could have on GPS technology in its many uses. The findings of LightSquared and the WG, with respect to the originally proposed use of the MSS spectrum, clearly show substantial interference to multiple devices utilizing GPS.

Subsequent to the conclusion of testing by the WG, LightSquared, independently and without consultation of the WG, proposed an amendment to its application to the FCC in which LightSquared agreed to utilize a lower portion of the MSS spectrum at reduced signal strength. LightSquared claims that this proposed alternative would substantially reduce or eliminate the interference in certain uses of GPS technology. Although the WG did not have an opportunity to conduct a thorough and complete review, the testing done by the WG and other independent analysis performed did show interference, contrary to LightSquared's claims.

This interference will likely result in the degradation of GPS signals in many uses vital to our nation's economy and safety, such as construction, agriculture, emergency response, aviation, maritime, consumers, and law enforcement. TomTom believes that both further testing by the WG of LightSquared's recently proposed use of the MSS spectrum and subsequent review by the FCC to ensure that the interference concerns regarding GPS have been addressed should be required before any permanent waiver can be considered.

Thus, TomTom respectfully requests that the FCC deny LightSquared's request for a waiver and prevent LightSquared from launching its commercial operations and expanding its network until the WG is allowed to examine the impact of the new proposed use of the MSS spectrum, consistent with the FCC's January 26, 2011 order. Furthermore, TomTom asks that the FCC facilitate the exploration of a solution that can be achieved with the cooperation of many industries – not the sacrifice of one. We encourage the FCC to engage the GPS community, LightSquared, broadband providers and other users of spectrum to work together to fulfill the goals of the National Broadband Plan in a manner that does not disrupt our national security and the economic investments of the farming, car manufacturing, aviation and other industries.

Sincerely,

A handwritten signature in black ink, appearing to read "Quentin Fendelet".

Quentin Fendelet
SVP, Finance & Administration